



PACIFIC WORKERS'
THE LAWYERS FOR INJURED WORKERS
Workers' Compensation - Personal Injury

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July 24, 2020

Dr. Adam J. Stoller
1900 Ofarrell Street, Suite 190
San Mateo, CA 94403

Re: Jonathan Shockley v. Cardionet LLC
WCAB ADJ12031731
DOI CT 06/25/2018 - 02/15/2019
Claim No. 7173815490

Dear Dr. Stoller:

My office represents *Jonathan Shockley* with respect to his above-referenced workers' compensation matter. Thank you for your continued participation as the QME. Please find the attached treatment records from Mr. Womble's primary treating physician, Dr. Jamasbi.

We are writing to request clarification as to whether Mr. Shockley sustained injury AOE/COE to his neck and bilateral upper arms, and whether he was to continue with the same restrictions back to at least 05/29/2019, when he was seen by Dr. O' Lang.

Body Parts Discussion: In your initial evaluation report of 01/23/2020, under **Impression** on page 9, you found diagnoses of cervicalgia and bilateral forearm pain. Then under **Causation**, also on page 9, you found 100% causation is found to the 02/15/2019 cumulative trauma injury. On page 10, under **Future Care**, you also outline that he may require a cervical epidural injection. With respect to Dr. Jamasbi, he has included a diagnosis of cervical disc disorder with radiculopathy, unspecified cervical region.

For the bilateral upper arms, Dr. Jamasbi provides diagnoses of other soft tissue disorders related to use, overuse and pressure to the bilateral upper arms.

Restrictions Discussion: In your initial report of 01/23/2020, you provide restrictions of lifting of no more than 5 pounds at the current time. Dr. Jamasbi provides restrictions of Repetitive activities using upper extremities limited to 1 hour in an 8-hour shift. No lifting, pushing, or pulling greater than 5 pounds. Lastly, Dr. O' Lang, on 05/29/2020, provided restrictions of no use of a computer.

We request that you issue a supplemental report addressing the following:

1. **Body Parts:** Please make an express statement as to whether or not Mr. Shockley sustained injury to the cervical spine and bilateral upper arms in connection with his accepted CT injury through 02/15/2019?

Oakland
510-444-2512

Stockton
209-789-9299

San Jose
408-840-0021

Sacramento
916-915-0222

Concord
925-438-0021

- a. Please explain why or why not for each body part in terms of reasonable medical probability.
2. **TTD/Work Restrictions:** Please clarify your work restrictions for Mr. Shockley considering the restrictions you provided, the restrictions by Dr. Jamasbi, and the restrictions by Dr. O'Laang.
 - a. Once these restrictions are clarified, what restrictions should Mr. Shockley have had back to 05/29/2019? Please explain in terms of reasonable medical probability.
3. **Records:** Please review the records of Dr. Jamasbi since your initial evaluation and discuss whether any of these records change any of the opinions outlined in your initial report or any of your supplemental reports.

Thank you for continued participation as the QME. The parties look forward to your supplemental report.

Very truly yours,
PACIFIC WORKERS' COMPENSATION LAW CENTER



Zachary Kweiler, Esq.
ZK/mg

Medical Index

RFA & Report by Dr. Jamasbi DOE 01/15/2020
RFA & Report by Dr. Jamasbi DOE 01/10/2020
RFA & Report by Dr. Jamasbi DOE 02/26/2020
RFA & Report by Dr. Jamasbi DOE 03/25/2020
RFA & Report by Dr. Jamasbi DOE 04/24/2020
RFA & Report by Dr. Jamasbi DOS 05/29/2020
RFA & Report by Dr. Jamasbi DOE 06/12/2020



UAN: PACIFIC WORKERS OAKLAND
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Jazmin Orozco-Salcedo, 510-444-2512x320
jazmin@pacificworkers.com

Re: *Jonathan Shockley v. Cardionet LLC*
ADJ: ADJ12031731

PROOF OF SERVICE

I, the undersigned, am over 18 years of age and not a party to the within-entitled action. I am employed at and my business address is Pacific Workers, 333 Hegenberger Road, Suite 504, Oakland, CA 94621.

On July 24, 2020 I served the following:

AA PQME Supplemental Report Request

BY MAIL: I am readily familiar with the firm's practice for collecting and processing mail with the U.S. Postal Service. Under that practice, mail would be deposited with the U.S. Postal Service that same day with postage thereon fully prepaid at Oakland, California in the ordinary course of business, addressed as follows, unless otherwise noted:

Colantoni Collins San Francisco
201 Spear Street, Suite 1100
San Francisco, CA 94105

Dr. Adam J. Stoller
1900 Ofarrell Street, Suite 190
San Mateo, CA 94403

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on July 24, 2020 at Oakland, California.



Maria Gaytan